

From: [Salinas, Amy](#)
To: [Mueller, Brian](#); [Werner, Robert](#)
Cc: [Cook, Brenda](#)
Subject: FW: Meeting re Delta Shipyard
Date: Monday, October 31, 2016 1:46:00 PM
Attachments: [image001.png](#)

Below are some of the areas that the Deans new counsel, Fran Phillips, would like to discuss with us on Thursday.

Brian, do you know these answers or do we need Brenda at the meeting?

Amy

From: Phillips, Fran [mailto:fphillips@gardere.com]

Sent: Monday, October 31, 2016 1:40 PM

To: Salinas, Amy

Subject: Meeting re Delta Shipyard

Amy:

This is confirm that we will be meeting this Thursday at 10:00 to discuss the Delta Shipyard Superfund Site and more particularly the Site as it relates to Lynn Dean as the landowner and allegedly a PRP.

You have asked several times what I want to discuss and quite frankly, I have not been able to respond with many specifics as I am new to the matter, representing the Deans through Gregory Rome, Williams & Rome, in Chalmette, LA. Both Mr. and Mrs. Dean are well into their 90s as I believe you are aware. Mr. Rome has sent me most of his file electronically. However, his file is over 6000 pages.

My reason for requesting the meeting with EPA was to cut through the paperwork, meet the key folks working on the matter, and listen to EPA's view about the Site and the status of the remediation. My goal is to find out what I need to know in short order to advise the Deans in the most cost effective and timely manner possible – which I assume would be in EPA's interest as well. I have reviewed the HRS, a few of the technical reports and some of the correspondence between EPA and the Deans, e.g the SNL. I have a few questions to get our meeting started that, hopefully, will not be difficult for EPA to answer:

1. Has the HRS been revised or the Site reranked from its initial score of 48.05?
2. Who, when and what documentation identified for the first time that EPA or the state knew that the Site had COCs that were leaving the Site and exceeded the state cleanup criteria? If you could point me in the right direction, I would like to review that work.
3. Has EPA or anyone identified the owners, operators or oil fields that sent the oilfield wastes to the Site?
4. Is there a list of the PRPs that have received SNLs or other notices of liability?
5. Has anyone on that list or otherwise agreed to perform the RI/FS or part of the RI/FS?
6. Has a list of de minimis parties been established?
7. Does EPA have a ballpark estimate of the likely cost of the RI/FS?
8. What is the status of the RI/FS – has the work already begun?
9. What is the next deliverable for the PRPs and when do you expect it?
10. When is the next deliverable for the Deans and when do you expect it?
11. The HRS identified concern for the human food chain and fish ingestion? Where would I find more information about who, what and where actual fishing has occurred in the area. Has the area been posted regarding this health concern or any other?

Thank you so much and looking forward to the meeting.

Fran Phillips

Partner

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